

**STATE OF SOUTH CAROLINA**  
**BEFORE THE PUBLIC SERVICE COMMISSION**  
**DOCKET NO. 2019-2-E**

In re: Annual Review of Base  
Rates for Fuel Costs for South  
Carolina Electric & Gas Company

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**PETITION TO INTERVENE**  
**OUT OF TIME**

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The South Carolina Coastal Conservation League (“CCL”) and Southern Alliance for Clean Energy (“SACE”) (collectively, the “Conservation Groups”) respectfully petition the Public Service Commission of South Carolina (“Commission”) to intervene in the above-captioned docket pursuant to R.103-825 of the Commission’s rules of practice and procedure. In support of this petition, Petitioners state as follows:

1. The Commission opened this proceeding pursuant to S.C. Code Ann. Section 58-27-865, which establishes the procedure for annual hearings for the Commission and all interested parties to review the fuel purchasing practices and policies of South Carolina Electric & Gas Company (“the Company”) and for the Commission and the Company to make adjustments as necessary.

2. S.C. Code Ann. Section 58-27-865 provides the procedure for review and recovery of fuel costs and of “incremental and avoided costs of distributed energy resource programs and net metering as authorized and approved under Chapters 39 and 40, Title 58[, which] shall be allocated and recovered from customers under a separate distributed energy component of the overall fuel factor that shall be allocated and

recovered based on the same method that is used by the utility to allocate and recover variable environmental costs.”

3. S.C. Code Section 58-39-140 of the South Carolina Distributed Energy Resource Act and Commission Order 2015-194 allow the Company to recover certain reasonable and prudent costs incurred to implement approved distributed energy resource (“DER”) programs, including certain costs related to net energy metering (“NEM”). Recoverable costs are capped in Section 58-39-150 “[f]or the protection of consumers and to ensure that the cost of DER programs do not exceed a reasonable threshold.”

4. Pursuant to the South Carolina Distributed Energy Resource Act and the Settlement Agreement approved by the Commission in Order No. 2015-194, Docket No. 2014-246-E, the Company will also compute and update annually the “costs and benefits of net metering and the required amount of the DER NEM Incentive” coincident in time with the Utility’s filing under the fuel clause.

5. CCL is a nonprofit organization whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in their communities by working with individuals, businesses and government to ensure balanced solutions. CCL supports the development of energy policy that is in the public interest of South Carolinians. CCL has members from across the State, including members who receive electricity service from the South Carolina Electric & Gas Co. and will be impacted by the decisions made in this proceeding regarding renewable energy and the recovery of fuel costs and incremental and avoided costs of distributed energy resource programs and net metering. The address of CCL’s main office is 328 East Bay Street, Charleston, SC 29402.

6. SACE is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. SACE and its members are interested in promoting greater reliance on clean energy resources to meet the South's energy needs. Like CCL, SACE has members from across the State, including members who receive electricity service from the Company and will be impacted by the decisions made in this proceeding regarding renewable energy and the recovery of fuel costs and incremental and avoided costs of distributed energy resource programs and net metering. The principal address of SACE is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina and South Carolina.

7. The Conservation Groups have participated as intervenors in multiple prior SCE&G fuel cost proceedings and distributed energy resource proceedings, including Docket Nos. 2014-246-E, 2015-53-E, 2015-54-E, 2015-55-E, 2015-203-E, 2015-204-E, 2015-205-E, and 2015-362-E.

8. The Conservation Groups and their members have direct and substantial interests that will be impacted by the decisions made in this proceeding regarding renewable energy, avoided cost calculations and tariff offerings, and the recovery of fuel costs and incremental and avoided costs of distributed energy resource programs and net metering, and their interests cannot be adequately addressed by any other party. The Conservation Groups seek to ensure that SCE&G's fuel purchasing practices and policies result in the lowest reasonable costs to customers, and that the Company's fuel costs are just and reasonable. In addition, the Conservation Groups will advocate for a full and proper valuation of NEM generation and appropriate cost recovery consistent with the

Settlement Agreement approved in Docket 2014-246-E that will accurately reflect and support an effective and diversified portfolio of distributed energy resources and lead to cleaner, safer, and healthier communities for all South Carolinians. The Conservation Groups also seek accurate and fair valuation of avoided costs and the related tariffs proposed through this proceeding. The Conservation Groups' support for these policies and involvement in this proceeding will promote their members' interests as well as the broader public interest.

9. The Commission established a deadline of December 6, 2018 for interested parties to file petitions to intervene in this proceeding. In the 2018 SCE&G fuel cost docket, Docket No. 2018-2-E, the Commission established an intervention deadline of January 25, 2018. Because the deadline for petitions to intervene in this docket was earlier than in past years, Conservation Groups simply missed the deadline to seek intervention. Counsel for the Conservation Groups regrets the oversight; however, in light of the schedule for the remaining deadlines in this docket and because no substantive testimony has been filed yet in the proceeding, no party will be prejudiced if leave is granted for Conservation Groups to intervene out of time. Intervening in this proceeding is also consistent with the Commission's policies encouraging maximum public participation in the issues before it.

10. Pursuant to R. 103-804(T) of the Commission's Rules of Practice and Procedure, the Conservation Groups are represented by counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record and participate fully in this proceeding by contributing testimony and presenting evidence at the hearing.

Respectfully submitted this 3rd day of January, 2019.

s/ J. Blanding Holman, IV

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*Attorney for Petitioners South Carolina  
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CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via electronic mail with a copy of the Petition to Intervene of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

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This 3rd day of January, 2019.

s/ Lauren Fry  
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